

JAMES M. PEARL (SB# 198481)
jamespearl@paulhastings.com
KIAURA CLARK (SB# 336314)
kiauraclark@paulhastings.com
PAUL HASTINGS LLP
1999 Avenue of The Stars, 27th Floor
Los Angeles, California 90067
Telephone: 1(310) 620-5700
Facsimile: 1(310) 620-5899

ADAM M. REICH (SB# 274235)
adamreich@paulhastings.com
EMMA LANZON (*pro hac vice*)
emmalanzon@paulhastings.com
PAUL HASTINGS LLP
71 South Wacker Drive, 45th Floor
Chicago, Illinois 60606
Telephone: 1(312) 499-6000
Facsimile: 1(312) 499-6100

*[Additional Counsel for Defendant
continued on next page]*

*Attorneys for Defendants Redwood Capital
Management, LLC; Redwood Master Fund,
Ltd; Redwood Opportunity Master Fund, Ltd;
Manuel 2018, LLC; Ginogerum, LLC; and
White-Hathaway Opportunity Fund, LLC*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

vs.

MINDGEEK S.A.R.L. a foreign entity; MG
FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM LTD, a
foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC., a
foreign entity; BERND BERGMAIR, a foreign
individual; FERAS ANTOON, a foreign
individual; DAVID TASSILLO, a foreign
individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware limited
liability company; REDWOOD DOE FUNDS
1-7; COLBECK CAPITAL MANAGEMENT,

CASE NO. 2:24-cv-4786

**REDWOOD
DEFENDANTS' NOTICE
IN RESPONSE TO THE
COURT'S MARCH 7, 2025
ORDER (ECF NO. 142)**

SAC filed: May 23, 2024

1 LLC, a Delaware company, COLBECK DOE
2 FUNDS 1-3,
3 Defendants.

1 *[Additional Counsel for Defendant continued from caption page]*

2 KRISTOPHER M. HANSEN (*pro hac vice*)
3 krishansen@paulhastings.com
4 **PAUL HASTINGS LLP**
5 200 Park Avenue
6 New York, New York 10166
7 Telephone: 1(212) 318-6000
8 Facsimile: 1(212) 752-3310
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NOTICE IN RESPONSE TO THE COURT’S MARCH 7, 2025 ORDER

Defendants Redwood Capital Management, LLC, Redwood Master Fund, Ltd, Redwood Opportunity Master Fund, Ltd, Manuel 2018, LLC, Ginogerum, LLC, and White-Hathaway Opportunity Fund, LLC (collectively, “Redwood Defendants”) have reviewed the Court’s March 7, 2025 Order Regarding Omnibus Motion to Dismiss (“Order”). *See* ECF No. 142.

Redwood Defendants file this Notice in compliance with the Court’s instruction, and consistent with the understanding of the Order, that the parties refile their Applications to Seal by March 28, 2025. Redwood Defendants narrowly tailored their Applications to Seal in connection with their Motion to Dismiss (ECF No. 69) and Reply in Support of Motion to Dismiss (ECF No. 112) (collectively, the “Applications”).

As set forth in the Applications, Redwood Defendants sought to seal only such material that had been designated confidential, either in the litigation or by third parties (the “Confidential Material”). Redwood Defendants have an obligation to maintain the confidentiality of such information, and such disclosure could expose Redwood Defendants to potential litigation. Separately, the Confidential Material also reflects confidential business strategies and approaches to financing negotiations of Redwood Defendants and other lenders, such that good cause and compelling reasons independently exist to seal such material. Accordingly, Redwood Defendants’ Applications are already narrowly tailored in accordance with the Court’s Order and instruction at the March 7, 2025 hearing.

For the foregoing reasons, Redwood Defendants therefore maintain the Applications as previously submitted, and respectfully request that the Court grant the Applications.

1 DATED: March 28, 2025

PAUL HASTINGS LLP

4 By: /s/ James M. Pearl

JAMES M. PEARL

6 *Attorneys for Defendants Redwood*
7 *Capital Management, LLC; Redwood*
8 *Master Fund, Ltd; Redwood Opportunity*
9 *Master Fund, Ltd; Manuel 2018, LLC;*
10 *Ginogerum, LLC; and White-Hathaway*
11 *Opportunity Fund, LLC*